

CONFIDENTIAL AND  
WITHOUT PREJUDICE

DRAFT  
07/12/84

LIST WHICH INCLUDES ALL ADDITIVES  
IN CIGARETTES AND FINE CUT TOBACCO  
MANUFACTURED IN CANADA

Canadian manufacturers of cigarettes and fine cut tobacco use only additives found in the attached List. This List has been compiled by Benson & Hedges (Canada) Inc., Imperial Tobacco Limited, RJR-Macdonald Inc. and Rothmans of Pall Mall Canada Limited who collectively manufacture 99% of the cigarette products consumed in Canada. The four companies do not use any additives in the manufacture of cigarettes and fine cut tobacco except those that are on the List.

The List has been furnished to the Health Protection Branch of the Department of National Health and Welfare by the four manufacturers with authorization to deliver it to members of the public who wish to examine it.

All Canadian manufacturers of cigarettes employ some additives in the manufacture of their products. These additives are commonly classified as preservatives, humectants and flavours and are employed in the formulation and processing of tobacco products. Generally speaking, the Canadian type manufactured cigarettes commonly smoked (95%), being made only from flue-cured Virginia type tobaccos, contain few additives.

In the past, each manufacturer has separately provided the Health Protection Branch with lists of additives employed. They have always been considered proprietary information and are treated as trade secrets. Moreover, such lists and the related formulations are considered competitive information and were provided on a strictly confidential basis. In furnishing the Health Protection Branch with the attached List of additives available for use in the industry, the trade secret and competitive position of each manufacturer with respect to each brand of cigarettes and fine cut tobacco is preserved.

The List was compiled by the scientific and research personnel of each of the four manufacturers from known additives employed in the manufacture of cigarettes and fine cut tobacco in Canada, North America and Western Europe. In drawing up the List, they have ensured that all of the

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additives conform to the guidelines of the Independent Scientific Committee on Smoking and Health to advise the Minister of Health and Social Security of the United Kingdom (the Hunter Committee) and include certain other additives which have been approved under the Nutrition and Consumer Goods Law of the Federal Republic of Germany (the West German lists). Each of the manufacturers has also agreed that any additions to be made to the List have met the same standards.

The Hunter Committee is a committee with strong medical and scientific representation appointed by the United Kingdom Government to study and report on a number of aspects of smoking and health. In its second report of December 1978 it dealt extensively with tobacco additives and published an approved list based on the available scientific information of long term use without evidence of danger to health. The Hunter Committee has also established procedures for the testing and addition of new additives to the list and pursuant to which a number of additions have been made. West Germany has also developed procedures for the approval of additives. These procedures have resulted in approval of a number of flavour additives that have not been considered by the Hunter Committee. The United Kingdom and West German procedures are believed to reflect the most advanced knowledge on the subject which is known to the western world. In compiling the List the Canadian manufacturers have relied upon the findings in both the United Kingdom and West Germany.

It is noteworthy that the United States recently enacted the Comprehensive Smoking Education Act. Among other things, it provides for the deposit annually with the Secretary of Health and Human Services of a list of the ingredients added to tobacco in the manufacture of cigarettes. This is to commence October 13, 1986. All information may be provided through a third party and is expressly stated to be trade secrets or confidential information under the Freedom of Information Act. The Act provides that it shall not be revealed to any person except Congress or one of its sub-committees on a confidential basis.

Each manufacturer intends to provide the Health Protection Branch with an annual certificate attesting that all additives employed by that manufacturer during the preceding year are to be found on the Canadian List.

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The four manufacturers have further agreed to co-operate, as they have in the past, with individual Canadian physicians whose patients are suffering from allergies allegedly caused by smoking Canadian cigarettes or fine cut tobacco containing one or more additives on the List. However, it is recognized that in most instances this will result in a recommendation that the patients affected simply stop smoking, and that under no circumstances will proprietary information regarded as trade secrets by an individual manufacturer be disclosed.

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